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March 12, 2014

By ECF
Honorable Raymond J. Dearie
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: United States v. Bebars Baslan et. al.
Criminal Docket 13 CR 220 (RJD)

Dear Judge Dearie,

With the government's consent, I respectfully request a one week extension of time in which to file the pre-trial motions for my client Bebars Baslan. My suggested amended filing schedule, which skirts Passover and jury selection in the Judge Ross trial, is as follows:

March 31- defense motions

April 18- government opposition

April 22- defense reply, if any

I realize that the reply is due the day before our scheduled status to select hearing dates, but I anticipate a brief letter reply to be filed the evening of the 22nd, right after the conclusion of the Passover holiday.

I thank Your Honor for your courtesy,

/s/

Ephraim Savitt

cc: All counsel (by ECF)